

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT  
SYSTEMS ANTITRUST LITIGATION**

**This Document Relates To:**

**THE DEALERSHIP CLASS ACTION**

MDL No. 2817  
Case No. 18-cv-00864

Hon. Robert M. Dow, Jr.  
Magistrate Judge Jeffrey T. Gilbert

**STATEMENT REGARDING SETTLEMENT ESCROW ACCOUNT**

On January 23, 2019, the Court approved the settlement between Dealership Class Plaintiffs and The Reynolds and Reynolds Company. *See* Final Approval Order and Judgment for Settlement Between the Dealership Class and Reynolds (ECF No. 502). In connection with that settlement, on November 7, 2018, the Court approved the establishment of an escrow account (the “Settlement Escrow Account”), held by the Court-appointed Settlement Administrator, Epiq Class Action & Claims Solutions, Inc., into which the Settlement Amount was deposited for the benefit of the Dealership Class. *See* Preliminary Approval Order for Settlement Between the Dealership Class and Reynolds (ECF No. 432) at ¶ 31. On January 23, 2019, the Court entered an Order authorizing Dealership Class Counsel to withdraw up to \$3,000,000 from the Settlement Fund, at their discretion, to pay reasonable expenses incurred in the litigation of this action. *See* Order Granting Advancement of Litigation Expenses From the Settlement Between the Dealership Class and Reynolds (ECF No. 501) at ¶ 2.

With regard to the Settlement Escrow Account, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Dealership Class Counsel are available to address this matter further at the request of the Court.

DATED: May 14, 2020

Respectfully submitted,

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth (*pro hac vice*)

Elizabeth McKenna (*pro hac vice*)

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***Interim Lead Counsel for the Dealership Class***

**CERTIFICATE OF SERVICE**

I, Peggy J. Wedgworth, an attorney, hereby certify that on May 14, 2020, I caused a true and correct copy of the foregoing **STATEMENT REGARDING SETTLEMENT ESCROW ACCOUNT** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth

Peggy J. Wedgworth